

Exhibit A

**IN THE JUSTICE OF THE PEACE COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY
COURT NO. 13**

**COURT ADDRESS:
1010 CONCORD AVE
WILMINGTON DE 19802**

CIVIL ACTION NO: JP13-16-011972

SHELLEY RESILARD HASKINS VS EXPERIAN ET AL

**SYSTEM ID: @2902371
EQUIFAX
2711 CENTERVILLE RD
STE-400
WILMINGTON DE 19808**

SUMMONS

TO ANY CONSTABLE OF SAID COUNTY OR OTHER DULY APPOINTED PROCESS SERVER:

We command you to summon, EQUIFAX the Defendant(s) to answer Plaintiff's claims against the Defendant(s) as stated in the attached Complaint, and serve upon said Defendant(s) a copy of this Summons and Complaint.

TO THE DEFENDANT(S):

Within 15 days after you receive this Summons, excluding the day you receive it, you must complete and return to the above named Justice of the Peace Court, the enclosed Answer (or other such filing) if you deny owing all or part of the money claimed as a debt against you by the Plaintiff in the Complaint.

Failure to file an Answer, or other written document related to this claim, with the Justice of the Peace Court may result in a default judgment being entered against you and action may be taken by the Plaintiff, such as the attachment of your wages or the attachment and sale of your property, to satisfy the judgment.

IN REPLEVIN ACTION: You are hereby ordered not to intentionally destroy, damage, sell or conceal the property in question. A violation of this Order could result in a Civil Contempt judgment being issued against you, in accordance with 10 Del. C. § 9506.

WAIVER OF JURY TRIAL: You are waiving trial by jury.

IT IS SO ORDERED this 03rd day of November, 2016.

C. Rose (SEAL)
Justice of the Peace/Court Official

CONSTABLE NOTES: Served
SERVED ON: 11/13/16
CONSTABLE: JHY

Print Form

**CERTIFICATE OF REPRESENTATION FOR AN ARTIFICIAL ENTITY OR PUBLIC BODY
IN CIVIL CASES IN THE JUSTICE OF THE PEACE COURT**

[PLEASE READ THE INFORMATION ON THE BACK OF THIS FORM BEFORE COMPLETING THE FORM. This certification form must be completed by an officer of the artificial entity or public body as defined by Supreme Court Rule 57, notarized and the original forwarded to the Chief Magistrate, 5 East Pine Street, Georgetown, Delaware 19947, along with the \$20 annual fee. Check or money order should be made payable to the Delaware Supreme Court.]

NAME OF BUSINESS (please print): _____ Co. ID # @ _____
(if previously assigned)

TYPE OF ENTITY; YOU MUST CHECK ONE OF THESE TO BE ELIGIBLE TO USE RULE 57:

<input type="checkbox"/> DE Corporation	<input type="checkbox"/> DE Partnership	<input type="checkbox"/> DE Limited Liability Co.
<input type="checkbox"/> DE Association	<input type="checkbox"/> DE Estate	<input type="checkbox"/> DE Trust
<input type="checkbox"/> DE Public Body	<input type="checkbox"/> Foreign Entity, reg. in DE	<input type="checkbox"/> DE Entity with Registered Tradename or Title

PRINCIPAL OFFICE ADDRESS

MAILING ADDRESS (where court notices are to be sent -- if
different than principal office address)

Street Address

Street Address

City State Zip

City State Zip

Telephone

Email Address

Telephone

Email Address

APPOINTS _____

Agent No. FA _____ (if previously assigned)

NAMED REPRESENTATIVE

The artificial entity or public body, through signature of an officer on this document, ratifies and confirms that the named representative is authorized to appear on its behalf in all matters before the Justice of the Peace Court, and agrees that it will be bound by the results of that representation. This certification makes the named representative of the artificial entity or public body an agent only for purposes of this representation. By filing a certification, the artificial entity or public body and its named representative are subject to the sanctions set forth in Justice of the Peace Court Rules for inappropriate actions.

The artificial entity/public body, through signature of an officer on this document, certifies and affirms:

- (1) That the artificial entity/public body is in good standing.
- (2) That the named representative has not been disbarred from, or is not currently under suspension or probation with respect to, the practice of law in any state or jurisdiction within the United States; and has not been convicted of a felony or a crime involving dishonesty or false statement in the ten (10) year period immediately prior to the appearance of the named representative in the Court; and has not been determined to have engaged in the unauthorized practice of law in this or any other jurisdiction; and is not an employee whose primary duty is to prosecute or defend Justice of the Peace Court civil actions; and has not had any prior authorization pursuant to this rule revoked by the Chief Magistrate.

(3)(a) That the OFFICER is:
(CHECK ONE)

- ☐ chief executive, president or chair
- ☐ vice-president or vice chair
- ☐ secretary or assistant secretary
- ☐ treasurer or assistant treasurer
- ☐ trustee of a trust
- ☐ executor or administrator of an estate
- ☐ general partner of a limited or general partnership
- ☐ manager or member of a limited liability company
- ☐ other officer who may bind the artificial entity

(specify) _____

(b) That the NAMED REPRESENTATIVE is:

- ☐ chief executive, president or chair
- ☐ vice-president or vice chair
- ☐ secretary or assistant secretary
- ☐ treasurer or assistant treasurer
- ☐ trustee of a trust
- ☐ executor or administrator of an estate
- ☐ general partner of a limited or general partnership
- ☐ manager or member of a limited liability company
- ☐ other officer (specify) _____

☐ full-time employee who has experience in the operations of the artificial entity/public body and knowledge of the necessary facts and law relevant to the action before the Justice of the Peace Court

Manager who is responsible for the management of the rental property at issue in the action before the Court

EXECUTED BY: _____
Officer of Artificial Entity or Public Body

NAME OF OFFICER (Printed): _____

SWORN TO AND SUBSCRIBED before me this _____
day of _____ A.D. 20 _____

Notary Public

EXECUTED BY: _____
Named Representative

SWORN TO AND SUBSCRIBED before me this _____
day of _____ A.D. 20 _____

Notary Public

**ARTIFICIAL ENTITY AND PUBLIC BODY *PRO SE* REPRESENTATION IN CIVIL
ACTIONS IN THE JUSTICE OF THE PEACE COURT**

➤ **What does Supreme Court Rule 57 do?** Rule 57 allows artificial entities or public bodies to file or defend a case and to appear in Justice of the Peace Court without being represented by a duly licensed Delaware attorney. For all purposes related to that representation, the representative is given a temporary and limited right to appear in JP Court for the entity.

➤ **How do I know if I am an artificial entity or public body and can appear in the Justice of the Peace Court without an attorney under Rule 57?** Under Supreme Court Rule 57, an artificial entity means any corporation incorporated in Delaware or doing business in Delaware pursuant to the provisions of 8 Del.C. §371 or the exceptions thereto contained in 8 Del. C. §373, any limited liability company defined under the provisions of 6 Del. C. §18-101, any partnership or limited partnership as defined in 6 Del. C. §15-101(11) *et seq.*, any trust as defined in 12 Del. C. §3501 *et seq.*, any estate as defined in 12 Del. C. §1501 *et seq.*, or other entity which has filed a certificate in the office of the Prothonotary in the County in which it does business designating a tradename or title pursuant to 6 Del. C. §3101. Public body means any regulatory, administrative, executive, or legislative body of the State or of any political subdivision of the State, including, but not limited to, any board, bureau, commission, department, division, district, agency, authority, or any municipal or county government. **IF YOUR ORGANIZATION DOES NOT FALL UNDER ONE OF THESE CATEGORIES, YOU MAY NOT TAKE ADVANTAGE OF RULE 57 PROVISIONS.** For example, if Joe Jones is a sole proprietor doing business as "Jones Restaurant", Joe Jones must appear himself (or have an attorney represent him) in Justice of the Peace court cases unless he either establishes a corporation, partnership, limited liability company, and/or registers his tradename in the office of the Prothonotary at the Superior Court of the county in which his business is located, and then files a Form 50 along with the annual fee, in the Chief Magistrate's office.

➤ **How can artificial entities or public bodies take advantage of Rule 57?** MOST IMPORTANTLY, J.P. CIV. FORM NO. 50 **MUST BE COMPLETED, NOTARIZED AND FORWARDED TO THE CHIEF MAGISTRATE, 5 EAST PINE STREET, GEORGETOWN, DELAWARE 19947, ALONG WITH THE \$20.00 ANNUAL REGISTRATION FEE.** The certificate must be signed by an officer of the artificial entity or public body (the definition of "officer" for Rule 57 is explained below) and the representative (see below), in the presence of a notary public. A \$20.00 annual registration fee must be sent with the original Form 50 to the Chief Magistrate's office. A check or money order must be made payable to the Delaware Supreme Court. **PLEASE BE SURE TO KEEP A COPY OF THE COMPLETED FORM 50 FOR YOUR RECORDS**, and a clocked in copy with you every time you are in Court.

➤ **Does Rule 57 allow an entity to appear without an attorney in all Delaware Courts?** NO. Provisions of Supreme Court Rule 57 only allow an artificial entity to appear without representation by an attorney in the Justice of the Peace Court. If a case is appealed to the Court of Common Pleas, artificial entities must be represented by an attorney in that court and other Delaware courts.

➤ **Who can sign the Form 50 certifying the named representative for the artificial entity?** The form 50 must be signed by an officer of the artificial entity or public body. To sign as an officer under Rule 57, a person must be one of the following: the chief executive; operating, financial, legal or accounting officer of an artificial entity or public body; chair of the governing board, president, treasurer, secretary, vice-president, vice-chair, assistant secretary, assistant treasurer, superintendent, or other person who performs a major policy making function for the artificial entity or public body; trustee of a trust; executor or administrator of an estate; general partner of a limited or general partnership; manager or member of a limited liability company; or any other individual designated as an officer by the artificial entity or public body. By signing the form, the officer is certifying under oath that the named representative has not been disbarred from, or is not currently under suspension or probation with respect to the practice of law in any State or jurisdiction within the United States; has not been convicted of a felony or crime involving dishonesty or false statement in the ten year period prior to the appearance of the respective in the Court; has not been determined to have engaged in the unauthorized practice of law in this or any other jurisdiction; has not had any prior certification revoked by the Chief Magistrate; and that it is not an employee's primary duty to prosecute or defend Justice of the Peace Court civil actions. **The officer who signed the form has the continuing responsibility to notify the Chief Magistrate's office and the Justice of the Peace Court in which the artificial entity or public body has a case pending of any material change and circumstances affecting the certificate.** This notification must occur within a reasonable time and at least one week prior to any appearance in a Justice of the Peace Court of the officer or employee involved.

➤ **Who can serve as a representative for an artificial entity or public body?** An officer as defined in Rule 57 may serve as a representative of an artificial entity or public body. In addition, a full-time employee who has experience in the operations of the artificial entity or public body and has knowledge of the necessary facts and law relevant to the case before the Justice of the Peace Court, a uniformed officer bringing action on behalf of a public entity to recover a civil penalty pursuant to 21 Del. C. §4101, §4802, or any subsequent civil penalty enacted by the legislature over which the Justice of the Peace Court is granted jurisdiction, or a manager who is responsible for the management of the property at issue in a case before the JP Court may also represent the entity or public body. A separate form must be filed for each representative.

➤ **How often does the Form 50 certificate need to be filed?** Form 50 certificates must be renewed annually by filing a new Form 50, along with the \$20.00 fee, with the Chief Magistrate's office on or before January 15th of each year. To be considered a renewal for the next year, the new Form 50 cannot be filed with the Chief Magistrate's office before December 15th (one month prior to the January 15th date). Certifications accepted on or after December 15th of each year are valid for the remainder of the certification term and also serve as renewal for the one year period following January 14th, unless terminated or revoked. The Chief Magistrate may revoke a certification at the Chief Magistrate's discretion, upon review of a certificate or upon recommendation of a Justice of the Peace. **The ability of a non-lawyer to represent an artificial entity or public body in the Justice of the Peace Court is a privilege, not a right.** Certificates containing false or fraudulent information shall be forwarded by the Chief Magistrate to the Department of Justice for prosecution or other action and to the Board on the Unauthorized Practice of Law, and representatives and officer signing the Form 50 may be sanctioned under JP Rules for inappropriate actions.

➤ **What should an artificial entity do if the named representative leaves?** When an officer or employee who has been certified to represent an artificial entity or public body leaves the employ of that entity, the entity must notify the Justice of the Peace Court in which an action is pending and the Chief Magistrate's office in writing immediately upon the termination of the officer or employee.

IN THE JUSTICE OF THE PEACE COURT OF THE STATE OF DELAWARE,

IN AND FOR

COUNTY

COURT ADDRESS

COURT NO

CIVIL ACTION NO

JP13-16-011972

Please list plaintiffs and defendants. Add additional party names and addresses on form CF01AP.

PLAINTIFF(S)

1) Name Shelley Resilard Haskins

Address 201 Philadelphia Pike

Wilmington, DE 19809

System ID#

Phone 646-431-4568

VS.

DEFENDANT(S)

1) Name Experian

Address Specify 1209 Orange Street

☐ Rental ☒ Mailing

Wilmington, DE 19801

System ID#

2666598

Phone

302-658-7581

PLAINTIFF(S)

2) Name

Address

System ID#

Phone

VS.

DEFENDANT(S)

2) Name

Equifax

Address Specify

2711 Centerville Rd, ste 400

☐ Rental ☒ Mailing

Wilmington, DE 19808

System ID#

1015932

Phone

302-636-5400

Plaintiff's Attorney or Agent, if any:

Address

System ID# (bar#)

Phone

☒ Individual☐ Corporation or other Artificial entity (see Supreme Court Rule 57)

Type of Service:

(Check One)

Court Service ☒Special Process Server ☐

Type of Action:

Debt ☒Replevin ☐Deficiency Judgment ☐

Defendant's Attorney or Agent, if any:

Address

System ID# (bar#)

Phone

Check One

☐ Individual☒ Corporation or other Artificial entity (see Supreme Court Rule 57)Alternate Address ☒ Physical ☐ Mailing ☐ Rental

Experian - P.O. Box 4000, Allen TX 75013

Equifax - P.O. Box 740256, Atlanta, GA 30374

Trespass ☐Summary Possession ☐

(Landlord Tenant)

COMPLAINT-

1. Concise Statement of Facts: (Who, What, When, Where, How?)

Please see attached for facts: Defamation / Slander of Credit File and Violation of Fair Credit Reporting Act (FCRA)

2. Relief Sought:

\$ 5,000

Amount of money claimed. (Not including interest)

\$ Pre Judgment Interest at or % legal rate % contractual rate

\$ Post Judgment Interest at the legal rate OR contractual rate of %

\$ 45.00 Court Costs.

\$ Other

☐

Possession

☐

Return of personal property

or

Jury Trial Demanded (Possession only) ☐ Yes ☐ No

\$

Total value (Attach list of property stating description, number and value of items on 8 1/2" x 11" paper)

TO: THE JUSTICE OF THE PEACE COURT

Please docket the above-captioned case and issue a Summons to the above-named Defendant(s) to appear before you so there may be a trial on this case and judgment for the Plaintiff(s), together with interest and costs of this proceeding; or, for an Attachment in Lieu of Summons, please issue same and direct the Constable to execute the proper process.

Date

Plaintiff or Plaintiff's Attorney

IN THE JUSTICE OF THE PEACE COURT OF THE STATE OF DELAWARE
IN AND FOR _____ COUNTY
COURT NO. _____

COMPLAINT FORM – ADDITIONAL PARTIES

CIVIL ACTION NO: _____

PLAINTIFF(S)

3) Name Shelley Resilard Haskins
Address 201 Philadelphia Pike, Unit 216
Wilmington, DE 19809
System ID# _____
Phone _____

VS. DEFENDANT(S)

3) Name TransUnion @291/195
Address Specify 19 Kris CT
☐ Rental ☐ Mailing Newark, DE 19702
System ID# 2578866
Phone 302-733-0600

PLAINTIFF(S)

4) Name _____
Address _____
System ID# _____
Phone _____

VS. DEFENDANT(S)

4) Name TransUnion @291/146
Address Specify 2711 Centerville Rd, Ste 400
☐ Rental ☐ Mailing Wilmington, DE 19808
System ID# _____
Phone 302-636-5401

PLAINTIFF(S)

5) Name _____
Address _____
System ID# _____
Phone _____

VS. DEFENDANT(S)

5) Name TransUnion, LLC @291/148
Address Specify P.O. Box 2000
☐ Rental ☐ Mailing Chester, PA 19022
System ID# _____
Phone _____

PLAINTIFF(S)

6) Name _____
Address _____
System ID# _____
Phone _____

VS. DEFENDANT(S)

6) Name _____
Address Specify _____
☐ Rental ☐ Mailing _____
System ID# _____
Phone _____

PLAINTIFF(S)

7) Name _____
Address _____
System ID# _____
Phone _____

VS. DEFENDANT(S)

7) Name _____
Address Specify _____
☐ Rental ☐ Mailing _____
System ID# _____
Phone _____

II. COMMENCEMENT OF ACTION; SERVICE OF PROCESS; PLEADINGS; MOTIONS AND ORDERS. Rule 3: Commencement of action.

(a) Commencement. A civil action is commenced by filing a complaint and praecipe with the Court in such form as the Court prescribes. Sufficient copies of the complaint shall be filed so that one copy can be served on each defendant. When an action is governed by a special statute, it shall be commenced in the manner prescribed by such statute.

VIEW YOUR CASE ONLINE: <http://courtconnect.courts.delaware.gov>

Experian

7/15/16 – Sent a dispute letter via certified mail/ return receipt (7016-0340-0000-1085-9457) to investigate and validate the following accounts reporting inaccurately:

ABE Federal Credit Union – Charged off 4,805 - **Violation 611(d)**

One Main Financial – Charged off 4,720

Wings Financial – 51100021 – Late 10X

Wings Financial – 51100015 – Late 6X

7/19/16 – Confirmed Received by Experian via USPS, Signed by Experian 7/20/16 by Mr. James Swanson

8/13/16 - Experian Responded, claiming to have verified all account in question, without proof.

8/20/16 – Sent 2nd request to Experian via certified mail/return receipt (7016-0340-0000-1085-8559) requesting an reinvestigation along with a request for a description of their procedure to investigate the accounts reporting negatively on my credit file.

8/23/16 – Confirmed Received by Experian via USPS, Signed by Experian 8/23/16 by Mr. James Swanson

8/31/16 – Received letter from Experian once again verifying not validating the inaccurate accounts on my credit file. Without proof of signature.

Violation of FCRA 611A, 616 and 617, 15. U.S.S, 1681i (a) 1681n, 1681o,

“negligent and willful failure to reinvestigate the disputed entries in violation of sections 611(a)(d)7, 616 and 617 of FCRA, 15 U.S.C, 1681i (a) 1681n, 1681o

Transunion

7/15/16 – Sent a dispute letter via certified mail/ return receipt (7016-0340-0000-1085-9440) to investigate and validate the following accounts reporting inaccurately:

One Main Financial – Charged off 4,720 – inaccurately reporting as open/charged off -

Wings Financial – 51100021 – Late 10X

Wings Financial – 51100015 – Late 6X

7/18/16 – Confirmed Received by Transunion via USPS, (9590-9402-1583-5362-8196-52)

7/19/16 – Transunion verified all 3 negative accounts without proof of signature.

8/20/16 – Sent 2nd request to Transunion via certified mail/return receipt (7016-0340-0000-1085-9068) requesting a reinvestigation along with a request for a description of their procedure to investigate the accounts reporting negatively on my credit file.

8/22/16 – Confirmed Received by Transunion via USPS, (9590-9402-1583-5362-8196-45)

9/4/16 – Received response Requesting address verification.

9/6/16 – Sent a copy of information to verify my address information via USPS certified/return receipt (7016-0340-0000-1085-9341)

9/8/16 – Confirmed received by Transunion via USPS (9590-9402-1583-5362-8196-21)

9/9/16 Received Response from TransUnion once again verifying the disputed accounts as accurate.

Violation of FCRA 611A, 616 and 617, 15 U.S.C., 1681i (a) 1681n, 1681o,

“negligent and willful failure to reinvestigate the disputed entries in violation of sections 611(a)(d)7, 616 and 617 of FCRA, 15 U.S.C., 1681i (a) 1681n, 1681o

**IN THE JUSTICE OF THE PEACE COURT OF
THE STATE OF DELAWARE, IN AND FOR NEW CASTLE COUNTY
COURT NO. 13**

**COURT ADDRESS:
1010 CONCORD AVE
WILMINGTON DE 19802**

CIVIL ACTION NO: JP13-16-011972

SHELLEY RESILARD HASKINS VS EXPERIAN ET AL

**SYSTEM ID: @2902371
EQUIFAX
2711 CENTERVILLE RD
STE-400
WILMINGTON DE 19808**

DEFENDANT'S ANSWER TO THE COMPLAINT

Check all that are appropriate:

- A. _____ I admit that I owe the debt or claim in the Complaint and **DO NOT** want a trial. (This means that you agree to a judgment being entered against you for the amount claimed plus interest and costs. Any money owed should be paid directly to the Plaintiff. **You will be giving up your right to a trial and will not have a right to appeal your decision to admit this debt or claim.**)
- B. _____ I WANT A TRIAL.
- C. _____ **DEBT ACTIONS ONLY:** In addition to a trial, I request that the Plaintiff provide me with a more detailed statement of the claim (Bill of Particulars).

DATED: _____

(Signature of Defendant)

(Defendant's Address/Phone No.)

(Defendant's Attorney, if any)

(Attorney's Address/Phone No.)

If you are a corporation (or other artificial entity or public body):

- This Answer **MUST** be signed by an attorney or person designated by a Certificate of Representation (Form 50) for the corporation or entity prior to the filing of this Answer.
- Only an attorney or a person designated in a Form 50 may represent you in JP court.
- **YOU MAY OBTAIN A FORM 50** and further information from the Court's website at <http://courts.state.de.us/jpcourt>. (Click on Form 50). Or, you may obtain a Form 50 from your nearest JP Civil Court.

Mail this completed form (Answer) to the Justice of the Peace Court at the address above as soon as possible. This signed document must be received by the Court within 15 days after the date you received it or a default judgment may be entered against you.

**IN THE JUSTICE OF THE PEACE COURT OF
THE STATE OF DELAWARE, IN AND FOR NEW CASTLE COUNTY
COURT NO. 13**

**COURT ADDRESS:
1010 CONCORD AVE
WILMINGTON DE 19802**

CIVIL ACTION NO: JP13-16-011972

SHELLEY RESILARD HASKINS, PLAINTIFF

VS

TRANS UNION, EXPERIAN, TRANS UNION LLC, TRANS UNION, EQUIFAX, DEFENDANTS

Plaintiff Parties:

**PLAINTIFF
SYSTEM ID: @2902369
SHELLEY RESILARD HASKINS
201 PHILADELPHIA PIKE
WILMINGTON, DE 19809**

Defendant Parties:

**DEFENDANT
SYSTEM ID: @2902370
EXPERIAN
1209 ORANGE STREET
WILMINGTON, DE 19801**

**DEFENDANT
SYSTEM ID: @2902371
EQUIFAX
2711 CENTERVILLE RD
STE-400
WILMINGTON, DE 19808**

**DEFENDANT
SYSTEM ID: @2911145
TRANS UNION
19 KRIS CT
NEWARK, DE 19702**

**DEFENDANT
SYSTEM ID: @2911146
TRANS UNION
2711 CENTERVILLE RD
STE 400
WILMINGTON, DE 19808**

**DEFENDANT
SYSTEM ID: @2911148
TRANS UNION LLC
PO BOX 2000
CHESTER, PA 19022**

Other Case Parties:

Form: 6CF07

Produced By: C. Rose Date: 11/3/2016 11:39 AM

